

WILLIAM R. BURGNER
State Bar Number 89508
1775 Hancock Street, Suite 285
San Diego, CA 92110
(619) 291-8565

Attorney for Defendant
IVAN GARCIA OLIVER

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO.: 07CR3192-IEG
)	
Plaintiff,)	NOTICE OF MOTION AND
)	MOTION TO:
vs.)	
)	1) COMPEL DISCOVERY
IVAN GARCIA OLIVER,)	2) LEAVE TO FILE
)	FURTHER MOTIONS
)	
)	DATE: April 7, 2008
Defendant.)	TIME: 2:00 PM
)	JUDGE: Hon. Gonzalez

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND MELANIE K. PIERSON, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on April or as soon thereafter as counsel may be heard, the defendant, Ivan Garcia Oliver, by and through his attorney William R. Burgener, will ask this Court to issue an order granting the motions listed below.

MOTION

The defendant, Ivan Garcia Oliver, by and through his attorney, William R. Burgener, asks this court pursuant to the Fifth and Sixth Amendments to the United States Constitution, Federal Rules of Criminal Procedure 12 and 16, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

1 1) compel discovery;

2 2) leave to file further motions.

3 These motions are based upon the instant motions and notice of motions, the attached
4 memorandum of points and authorities, the files and records in the above-captioned matter, and
5 any and all other materials that may come to this Court's attention prior to or during the hearing
6 of these motions.
7

8 Respectfully submitted,

9
10 Dated: March 12, 2008

s/William R. Burgener
11 WILLIAM R. BURGNER
12 Attorney for Defendant
13 IVAN GARCIA OLIVER
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28